

**WOLVERINE TUBE, INC.**

2100 Market Street, N.E. · Post Office Box 2202 · Decatur, Alabama 35609-2202 · Telephone 256-353-1310

March 13, 2012

Ms. Joan Tanaka, Chief  
Remedial Response Branch #1, Superfund Division  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Dear Ms. Tanaka:

I am writing on behalf of **Wolverine Tube, Inc.**, a Delaware corporation ("WTI" or "we"), to acknowledge receipt of your Second Notice letter dated February 24, 2012, regarding the Chemetco Superfund Site. We also have reviewed the General Notice Letter dated November 30, 2011, that was addressed to Wolverine Tube Canada ("W. Canada").

At the outset, we believe it important to explain briefly the relationship of WTI and W. Canada. WTI and W. Canada are currently, and have always been, separate and distinct legal entities. Prior to 2008, W. Canada was a subsidiary of WTI. In 2008, however, the ownership of W. Canada was sold to an independent third party. Since 2008, W. Canada has remained owned by that independent third party and Wolverine has not had any direct or indirect ownership or control of W. Canada. Accordingly, we write you solely on behalf of WTI.

It is our current understanding that WTI never sent materials, of any kind, to the so-called "Chemetco Superfund Site." With that said, we acknowledge that our response to the Information Request is due on or before May 4, 2012. We also confirm, without acknowledging any liability or responsibility, that we intend to negotiate with EPA.

If you have any questions concerning any of the matters set forth herein, please do not hesitate to contact me.

Sincerely,

Mark Brown  
Wolverine Tube Inc.